REMARKS

The Office Action of July 1, 2010 has been received and carefully considered. However, Applicant respectfully disagrees with Examiner's rejection of the pending claims based on 35 U.S.C. 103(a). In the present Amendment, Applicant has amended Claims 20, 37, 44, 45 and added new Claim 47 to overcome the rejections and further specify the embodiments of the present invention. It is respectfully submitted that no new matter has been introduced by the amended and new claims. All claims are now present for examination and favorable reconsideration is respectfully requested in view of the previous amendments and the following comments.

REJECTIONS UNDER 35 U.S.C. § 103 (a):

Claims 20, 26 – 28, 30 – 34, 36 – 37, 39, 41 – 42 have been rejected under 35 U.S.C. §103 as allegedly being unpatentable over Lee (US 7,065,196) in view of Hara (US 6,895,241). Claims 21 and 44 – 45 have been rejected under 35 U.S.C. §103 as allegedly being unpatentable over Lee in view of Hara and further in view of Martin (WO 00/35178). Claim 22 and 46 have been rejected under 35 U.S.C. §103 as allegedly being unpatentable over Lee in view of Hara further in view of Trell (US 5,046,083). Claims 24 and 35 have been rejected under 35 U.S.C. §103 as allegedly being unpatentable over Lee in view of Hara and further in view of Trell (US 3,947,641). Claim 43 has been rejected under 35 U.S.C. §103 as allegedly being unpatentable over Lee in view of Hara and further in view of Franz (US 20070229569).

Applicant traverses the rejection and respectfully submits that the embodiments of present-claimed invention as amended are not obvious over the cited references. The pending claims have been amended to clearly distinguish the present invention from the prior art. The specification of the present application (paragraph [0003], lines 5-6) discloses "occasional ... visitors/users (hereinafter "visitors")". Thus, the "visitor" according to the present invention is an "occasional" visitor, which means that he or she

is "not registered" or "not preauthorized." Therefore, there is support in the original specification for the claims amendment to distinguish the present invention from Hara (US 6,895,241). Hara, in all its claims (Claim 1, Col 6, lines 2-3 and Claim 3, paragraph 3) and in its descriptions, states and stresses "registered" visitors. Thus, Applicant respectfully submits that Hara does not address the same problem as the present invention and is not relevant to the present invention.

An undeniable advantage of the present invention over the cited references is that the present invention provides services to occasional visitors, which is one central feature that is not taught or suggested by either Hara or other references. Applicant has previously pointed out this and other limitations as well as advantages over the cited references. Especially, Applicant has provided specific reasons traversing Examiner's changing positions between the Office Actions of July 16, 2009 and December 1, 2009 regarding the teaching of Lee (page 6 resp. page 5) from "...when wishing to perform an authorized service function, i.e. provide access," to "...when said B-replier wishes to grant said visitor said requested access." The latter position is still maintained in the present Office Action of July 1, 2010. Applicant maintains that Lee does not show this limitation.

The Examiner alleges that "it is well known B should end the call with the visitor in order to call the device that activates the lock." However, the Examiner has not provided any evidence supporting such an assertion.

It is respectfully submitted that the "B-replier" in Lee does not disclose granting "said visitor said requested access" at all, by making a telephone call to the device. The significance of the ending of the visitors call shows that Lee is withdrawn as a reference or not considered as disclosing the possibility to grant said visitor said requested access, because at step 108 of Fig. 3, the only step where the opening command for said visitor can be given (Lee, col. 5, lines 3-4), there is no disclosure on granting "said visitor said requested access" at all, by making a telephone call to the device.

Examiner has abandoned Martin as a reference against Claims 20, 26 – 28, 30 – 34, 36 – 37, 39, 41 – 42 of the present application, this shows that the Examiner has recognized Applicant's previous arguments that Martin was redundant because Lee already had such a feature. Applicant respectfully disagrees with Examiner's citation of Hara, as argued and shown in the Amendment of February 22, 2010. The Martin and Hara references are equivalent, and Hara does not provide any change or add any advantage at all.

Regarding Martin and "cradle", Examiner is incorrect in the understanding of the mobile phone technology (see page 7 of the Office Action). If the communication shown in Fig. 1 of Martin (as everywhere described in Martin) is a regular mobile-phone communication, where is the cradle communication and parts? On the other hand, if it is a cradle communication, where is the regular mobile-phone system? In the present application's specification, claims and Fig. 2, it is clearly shown/disclosed that BOTH systems must be there CONCURRENTLY to achieve this new, smart and advantageous functionality of those embodiments of the present invention. Please note that Claim 44 depends on Claim 26, which depends on Claim 20. Thus, Claim 44 includes the steps of Claim 20, which in step (a) includes establishing contact with a B-replier by the visitor through a mobile phone (Claim 26), then in steps (b) through (e), the cradle/near communication device is used. Lee, Hara or Martin fails to teach the use of BOTH mobile phone communication with B-replier AND placing the mobile phone against a cradle to establish two-way signaling line connection between the B-replier and the device.

To provide access for occasional "visitors", Lee must have installed an expensive and vulnerable entry telephone system of Trell. As an added feature, Lee can open the entrance doors for registered "residents" when these residents call with their registered mobile phones from outside of the locked door. There is no motivation or suggestion to add Martin to Lee's system because Martin does not provide any useful functionality. According to Martin, registered users open the locked (e.g. garage) door when the registered users called the system with their registered mobile phones from outside of the

locked door. Similarly, there is no motivation or suggestion to add Hara to Lee's system, since Hara opens the locked (delivery locker) door when called by registered users with their registered mobile phones from outside the locked door. None of the prior art references discloses that a third party B-replier by his or her own decision can open the door in response to a telephone call from occasional "visitors" without cost to the B-replier, according to the present invention. In Hara, the "service provider" is the second party being called, which directs the lock-controlling computer to open for only "registered" and blindly deny all other callers.

Even more advantageous over existing entrance telephone systems than Lee system, the present invention stands out if one instead compares it with the intercom systems. A conventional system for up to 50 apartments can cost between $20,000 - 30,000 to install, and but it may lack features such as video. Including the video feature can triple the cost. On the other hand, the present invention costs about $1,000, irrespective of the number of apartments behind the entrance. For a 100-house installation, the cost for intercom systems with video features may be $ 2 - 4 millions, whereas corresponding cost according to the present invention would be about $ 100,000.

In addition to the lower costs for system installation, there are also savings on calling fees for property-owners and residents. Service/repair costs will be minimal with the present invention as opposed to conventional systems which often require repairs due to external influence and/or vandalism. The present invention achieves the same or even better function than the conventional entrance telephone systems at an extraordinarily low cost. Savings are made not only in money but also in energy consumption.

In summary, none of the cited references alone or in combination suggests or discloses the present invention as claimed. Therefore, the rejection under 35 U.S.C. § 103 has been overcome. Accordingly, withdrawal of the rejections under 35 U.S.C. § 103 is respectfully requested.

Having overcome all outstanding grounds of rejection, the application is now in condition for allowance, and prompt action toward that end is respectfully solicited.

Respectfully submitted,

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